



In the Matter Of:

CHEYENNE GOODMAN vs

EDWIN LEON

NEHAMA HANOCH

March 15, 2023



Nehama Hanoch - March 15, 2023

<p>1 IN THE FAMILY COURT 2 OF THE STATE OF DELAWARE 3 IN AND FOR NEW CASTLE COUNTY 4 5 6 CHEYENNE GOODMAN,) 7) File No. 8) CN23-01005 9) Petitioner, 10) 11) 12) 13) 14) 15) 16) 17) 18) 19) 20) 21) 22) 23) 24)</p> <p>Deposition of NEHAMA HANOCH taken pursuant to notice at the law offices of Bayard, P.A., 600 North King Street, 4th Floor, Wilmington, Delaware, beginning at 3:37 p.m. on Wednesday, March 15, 2023, before Kurt A. Fetzer, Registered Diplomat Reporter and Notary Public.</p> <p>LEXITAS REPORTING Registered Professional Reporters 1330 King Street Wilmington, Delaware 19801 (302) 655-0477 www.lexitaslegal.com</p>	<p>1 NEHAMA HANOCH, 2 the deponent herein, having first 3 been duly sworn on oath, was 4 examined and testified as follows: 5 EXAMINATION 6 BY MS. SWASEY: 7 Q. Ms. Hanoch, have you ever had 8 your deposition taken before? 9 A. No. 10 Q. So the rules are fairly simple. 11 If you don't understand a question or 12 you can't hear me, make sure that you 13 ask me to repeat the question. 14 If you don't ask me to 15 repeat or clarify it, then I'm going to 16 assume that you understood the 17 question. 18 Do you understand that 19 question? 20 A. I do. Thank you. 21 Q. All of your responses have to be 22 clear and verbal, so don't say uh-huh 23 or shake your head because our court 24 reporter needs to capture your</p>
<p>1 APPEARANCES: 2 PATRICIA M. WEIR, ESQ. 3 THE YEARGER FIRM, LLC 4 2 Mill Road - Suite 105 5 Wilmington, Delaware 19806 6 For the Petitioner 7 KARA M. SWASEY, ESQ. 8 BAYARD, P.A. 9 600 North King Street - Suite 400 10 Wilmington, Delaware 19801 11 For the Respondent 12 ERIC R. HACKER, ESQ. 13 MORRIS JAMES LLP 14 500 Delaware Avenue - Suite 1500 15 Wilmington, Delaware 19801 16 For the Witness 17 ALSO PRESENT: 18 EDWIN LEON (REMOTELY) 19 CHEYENNE GOODMAN 20 - - - - - 21 22 23 24</p>	<p>1 responses. 2 Do you understand that? 3 A. Yes. 4 Q. Also, we have a whirling above 5 your head so you will have to keep your 6 voice up because we have to make sure 7 we get it in the record. 8 A. Okay. 9 Q. Are you under the influence of 10 any drugs, prescription or otherwise, 11 that would impact your testimony today? 12 A. No. 13 Q. Have you taken any prescription 14 medication today? 15 A. No. 16 Q. So I understand that you and 17 some coworkers went out on the evening, 18 I'm going to call it Friday evening of 19 December 15th. 20 How did that plan to go out 21 come about? 22 A. I don't know how the plan 23 originated. I was invited by Tim 24 Powell to join. I think it was Friday,</p>

<p>5</p> <p>1 December 16th.</p> <p>2 Q. And who went?</p> <p>3 A. I was there, Chey, Tim, Roxanne,</p> <p>4 Alex, Edwin, Nikita.</p> <p>5 I think that's it.</p> <p>6 Q. Were there different people</p> <p>7 there for the dinner part of it and for</p> <p>8 later in the evening?</p> <p>9 A. Oh, I'm sorry. Emily Jones and</p> <p>10 Carol were there also and so was</p> <p>11 Emily's fiance.</p> <p>12 I think Emily came at the</p> <p>13 bar. She wasn't there for the dinner,</p> <p>14 so her and her fiance showed up after.</p> <p>15 Q. Were you dating or in a</p> <p>16 relationship with anyone who was there?</p> <p>17 A. No.</p> <p>18 Q. How did you get there?</p> <p>19 A. Carol drove.</p> <p>20 Q. And who drove with Carol?</p> <p>21 A. Chey was also there.</p> <p>22 Q. She drove her own vehicle?</p> <p>23 A. Carol drove her own vehicle, I</p> <p>24 think.</p>	<p>7</p> <p>1 across from me.</p> <p>2 Q. Where was Mr. Leon?</p> <p>3 A. He was on my side of the table</p> <p>4 but at the very end further to the</p> <p>5 right.</p> <p>6 Q. Did you observe Ms. Goodman and</p> <p>7 Mr. Leon communicating with one another</p> <p>8 via Snapchat during the dinner or any</p> <p>9 other electronic communication?</p> <p>10 A. No.</p> <p>11 Q. Do you have Snapchat?</p> <p>12 A. Yes.</p> <p>13 Q. Were you communicating with</p> <p>14 anyone via Snapchat at dinner?</p> <p>15 A. I don't recall.</p> <p>16 Q. In response to the subpoena did</p> <p>17 you review any of your Snaps?</p> <p>18 A. I tried to, yeah. I don't have</p> <p>19 anything saved so I just...</p> <p>20 Q. You tried to but there was</p> <p>21 nothing that was saved because Snapchat</p> <p>22 disappears unless you save it?</p> <p>23 A. Yes.</p> <p>24 Q. On that Friday night before</p>
<p>6</p> <p>1 Q. And what was the plan for how</p> <p>2 you were going to get home that</p> <p>3 evening?</p> <p>4 A. The plan that I had set with</p> <p>5 Chey was that we would Uber home</p> <p>6 together. Emily had mentioned at</p> <p>7 another point in the night that she</p> <p>8 could drive us home as well.</p> <p>9 Q. Was Emily driving?</p> <p>10 A. Her fiance. Her fiance was</p> <p>11 sober that night.</p> <p>12 Q. And how was it that you and</p> <p>13 Ms. Goodman did go home that evening?</p> <p>14 Did you go in a Uber like planned?</p> <p>15 A. Emily's fiance drove us home.</p> <p>16 Q. Where did you sit at dinner?</p> <p>17 Who were you sitting next to?</p> <p>18 A. I was sitting at the far left of</p> <p>19 the table. Nikita was sitting at like</p> <p>20 the head of the table right to my left.</p> <p>21 Q. Where was Ms. Goodman in</p> <p>22 relationship to you?</p> <p>23 A. She was not directly across from</p> <p>24 me but next to the person directly</p>	<p>8</p> <p>1 dinner what was your understanding of</p> <p>2 the relationship between Mr. Leon and</p> <p>3 Ms. Goodman?</p> <p>4 A. My understanding was that he had</p> <p>5 been sexually harassing her, that he</p> <p>6 had been threatening her and that she</p> <p>7 was terrified of him.</p> <p>8 Q. So sitting there at dinner that</p> <p>9 was your impression, that was your</p> <p>10 understanding of their relationship?</p> <p>11 A. Yes.</p> <p>12 Q. And how did you reach that</p> <p>13 understanding?</p> <p>14 A. Because Chey had confided in me</p> <p>15 on several occasions.</p> <p>16 Q. When did she tell you that?</p> <p>17 A. The first time she told me was</p> <p>18 in September.</p> <p>19 Q. And what was the context for</p> <p>20 that?</p> <p>21 A. The context was that she was</p> <p>22 texting me and saying she needed to</p> <p>23 vent about Edwin.</p> <p>24 Q. Did you produce that text</p>

<p>9</p> <p>1 message?</p> <p>2 A. I did.</p> <p>3 MS. SWASEY: Is that in the</p> <p>4 first tranche?</p> <p>5 MR. HACKER: It would be in</p> <p>6 the first tranche.</p> <p>7 BY MS. SWASEY:</p> <p>8 Q. And what did she say in the text</p> <p>9 message?</p> <p>10 A. I don't recall the specific</p> <p>11 words, but if you want me to look at it</p> <p>12 I can take a look at it.</p> <p>13 Q. Just give me the gist of it.</p> <p>14 What did she say?</p> <p>15 A. Just he had been hazing her at</p> <p>16 work, calling her at early times in the</p> <p>17 morning to ask her to -- sorry. I just</p> <p>18 need a second.</p> <p>19 He was calling her at early</p> <p>20 times in the morning to ask her to do</p> <p>21 stuff for him and that he had been</p> <p>22 telling her that she can't leave the</p> <p>23 office before him, yelling at her.</p> <p>24 That was the gist of it.</p>	<p>11</p> <p>1 harassment component to that?</p> <p>2 A. She told me -- I think this was</p> <p>3 very early October. She told me that</p> <p>4 she had been dog sitting for him and</p> <p>5 that she found a room in his house that</p> <p>6 was full of scary sex things like -- I</p> <p>7 don't remember exactly. I think she</p> <p>8 said there was a cage, like a red room,</p> <p>9 and that when she got back -- when he</p> <p>10 got back, I'm sorry, he immediately</p> <p>11 said I knew you found my room.</p> <p>12 And then the gist of it was</p> <p>13 that he was trying to make her a sex</p> <p>14 slave and she said that she didn't want</p> <p>15 to do that. I don't know what she</p> <p>16 said, but she didn't want to do that.</p> <p>17 Q. That was in early October?</p> <p>18 A. It was in early October that she</p> <p>19 told me that.</p> <p>20 Q. When was this dog sitting event?</p> <p>21 A. Sometime in the summer.</p> <p>22 Q. At what point did you become</p> <p>23 aware that they had a sexual</p> <p>24 relationship?</p>
<p>10</p> <p>1 I'm sure there are other details in the</p> <p>2 text message. That was the gist of</p> <p>3 what she said.</p> <p>4 Q. And what did you do as a result</p> <p>5 of that text message?</p> <p>6 A. I told her that she should --</p> <p>7 the gist of it is that I told her that</p> <p>8 she should not answer and if she did</p> <p>9 answer she should put it in an e-mail</p> <p>10 and say sorry I missed your call so</p> <p>11 that it would be in writing and that</p> <p>12 she shouldn't answer him unless it was</p> <p>13 between 8:30 and 6:30-ish, which we</p> <p>14 consider normal working hours.</p> <p>15 Q. What was the sexual harassment</p> <p>16 part of her complaint?</p> <p>17 A. Kind I clarify? Do you mean the</p> <p>18 complaint that she made to me in</p> <p>19 September or the petition?</p> <p>20 Q. Well, you told me that in</p> <p>21 September that she told you that he was</p> <p>22 sexually harassing and terrifying her.</p> <p>23 A. Yes.</p> <p>24 Q. So where is the sexual</p>	<p>12</p> <p>1 A. I became aware of that on</p> <p>2 Sunday, December 18th, 2022.</p> <p>3 Q. I'm sorry. I realize that there</p> <p>4 probably was, maybe there was something</p> <p>5 else to answer this, that prior to</p> <p>6 dinner on that Friday night -- so you</p> <p>7 said that there was a September and in</p> <p>8 October she told you about the dog</p> <p>9 sitting event.</p> <p>10 Were there other times that</p> <p>11 she said to you or talked to you about</p> <p>12 her relationship with Mr. Leon?</p> <p>13 A. She told me about other times</p> <p>14 that he had been harassing her, yes.</p> <p>15 Q. And what were those other times?</p> <p>16 A. She told me things like Edwin</p> <p>17 came in today at work and told me that</p> <p>18 my shirt was too low cut. Edwin asked</p> <p>19 me or said to me I know you're not</p> <p>20 wearing any underwear.</p> <p>21 Q. When did those comments get</p> <p>22 made?</p> <p>23 A. The underwear comment was made</p> <p>24 that Friday night on December 16th.</p>

<p style="text-align: right;">13</p> <p>1 Q. At work?</p> <p>2 A. No. When we were at -- she told</p> <p>3 me when we were at Woody's and she said</p> <p>4 he had made the comment that night.</p> <p>5 And I don't know if he made the comment</p> <p>6 at Woody's or somewhere else that</p> <p>7 night.</p> <p>8 The low-cut shirt was at</p> <p>9 work. I remember seeing her very upset</p> <p>10 and I asked her what happened. And she</p> <p>11 said Edwin had commented that her shirt</p> <p>12 was too low cut.</p> <p>13 There might have been other</p> <p>14 times. I can't recollect at this very</p> <p>15 moment.</p> <p>16 Q. Sorry. On Sunday you became</p> <p>17 aware that they had a sexual</p> <p>18 relationship?</p> <p>19 A. Sunday, December 18th.</p> <p>20 Q. What did she tell you about that</p> <p>21 relationship?</p> <p>22 A. She told me that they had hooked</p> <p>23 up over the summer at some point and at</p> <p>24 that point she didn't want to do it</p>	<p style="text-align: right;">15</p> <p>1 it.</p> <p>2 Q. Let me put it this way: What is</p> <p>3 your belief sitting here today about</p> <p>4 the nature of their relationship, the</p> <p>5 nature of their relationship over the</p> <p>6 summer and into the fall of 2022?</p> <p>7 A. Without knowing any specific</p> <p>8 details about that, I would say it's</p> <p>9 possible that they hooked up</p> <p>10 consensually a couple of times. That's</p> <p>11 all I can say. I'm just speculating.</p> <p>12 Q. Did you ask her about the nature</p> <p>13 of their relationship?</p> <p>14 A. Are you asking me if I asked</p> <p>15 that day when she told me?</p> <p>16 Q. Or after.</p> <p>17 A. I had asked her questions</p> <p>18 before, yes.</p> <p>19 Q. About the nature of their</p> <p>20 relationship?</p> <p>21 A. (The witness nodded.)</p> <p>22 Q. And what was her response?</p> <p>23 A. She would tell me some of the</p> <p>24 things that he did to her.</p>
<p style="text-align: right;">14</p> <p>1 anymore and he made her do it anyway.</p> <p>2 Q. So one time they hooked up. And</p> <p>3 did she make it sound like it was an</p> <p>4 ongoing thing or just one time?</p> <p>5 A. Do you mean did she make it</p> <p>6 sound like it was consensual one time</p> <p>7 or non-consensual --</p> <p>8 Q. No. You said they hooked up.</p> <p>9 I'm trying to figure out if that means</p> <p>10 multiple times they hooked up. Were</p> <p>11 they having sex over the course of</p> <p>12 time?</p> <p>13 How was it characterized to</p> <p>14 you?</p> <p>15 A. It was characterized that they</p> <p>16 hooked up. I can't recall if she</p> <p>17 clarified if it was once or more than</p> <p>18 once.</p> <p>19 Q. Did you believe it was once or</p> <p>20 more than once?</p> <p>21 MR. HACKER: Objection to</p> <p>22 form.</p> <p>23 You can answer.</p> <p>24 A. I really haven't thought about</p>	<p style="text-align: right;">16</p> <p>1 Q. And what did she tell you?</p> <p>2 A. I'm sorry. She told me that he</p> <p>3 had strangled her to the point of</p> <p>4 passing out on multiple occasions, both</p> <p>5 during sex and without sex, such as</p> <p>6 when she tried to leave he strangled</p> <p>7 her.</p> <p>8 She told me about times he</p> <p>9 had hit her with his belt even though</p> <p>10 she didn't want him to and she told him</p> <p>11 that she didn't like that. She told me</p> <p>12 about times that he had choked her</p> <p>13 during sex and she had tried to take</p> <p>14 his hands off her by grabbing onto his</p> <p>15 arms and that he started tying her up</p> <p>16 after that so she couldn't do that</p> <p>17 anymore and told her that this is how</p> <p>18 it works.</p> <p>19 She told me about -- she</p> <p>20 didn't tell me that. I read it in the</p> <p>21 petition about what happened on</p> <p>22 Saturday, December 17th when he raped</p> <p>23 her again. She told me that he had</p> <p>24 said to her that he was conditioning</p>

<p style="text-align: right;">17</p> <p>1 her and that he didn't appreciate being</p> <p>2 called a rapist.</p> <p>3 Q. Did you understand that they</p> <p>4 were engaging in a BDSM relationship?</p> <p>5 A. That was not my understanding,</p> <p>6 no.</p> <p>7 Q. Did you ask her?</p> <p>8 A. I had a conversation with her</p> <p>9 where I asked if Edwin had ever asked</p> <p>10 her if she was willing to be in one.</p> <p>11 Q. And what did she say?</p> <p>12 A. No.</p> <p>13 Q. She said no, he never asked her?</p> <p>14 A. No, she wasn't willing to be in</p> <p>15 one.</p> <p>16 Q. When did that conversation</p> <p>17 occur?</p> <p>18 A. This most recent conversation?</p> <p>19 Q. This conversation that you were</p> <p>20 just referring to. You said when you</p> <p>21 asked her she said no, she wasn't</p> <p>22 willing to be in a BDSM relationship</p> <p>23 with him.</p> <p>24 MR. HACKER: Can you clarify</p>	<p style="text-align: right;">19</p> <p>1 Q. So that was October?</p> <p>2 A. Early October, yes.</p> <p>3 Q. So at that point she had told</p> <p>4 you that she was having sex with him or</p> <p>5 had had sex with him?</p> <p>6 A. No.</p> <p>7 Q. So you just asked her?</p> <p>8 A. Because she told me about his</p> <p>9 red room.</p> <p>10 Q. So you asked her well, has he</p> <p>11 ever asked you to be in that type of</p> <p>12 relationship and then she said no?</p> <p>13 A. Yes.</p> <p>14 Q. Did you ever ask her after that</p> <p>15 or after the events in December?</p> <p>16 A. I don't recall.</p> <p>17 Q. Do you know how long their</p> <p>18 sexual relationship lasted?</p> <p>19 A. I don't know how long the</p> <p>20 consensual sexual relationship lasted.</p> <p>21 I know that he stopped raping her after</p> <p>22 I found them that night or the next day</p> <p>23 after.</p> <p>24 Q. How do you know that?</p>
<p style="text-align: right;">18</p> <p>1 what you're asking, which conversation?</p> <p>2 The conversation between my client and</p> <p>3 the petitioner or the conversation that</p> <p>4 she's referring to in the conversation?</p> <p>5 Q. The conversation where your</p> <p>6 client was talking to the petitioner.</p> <p>7 When did that happen?</p> <p>8 A. I don't remember when it</p> <p>9 happened.</p> <p>10 And I should clarify. I</p> <p>11 didn't say BDSM. I asked submissive</p> <p>12 dominant. They may be similar, but I</p> <p>13 just want to clarify.</p> <p>14 Q. Sure. So we all understand, we</p> <p>15 can use the same words.</p> <p>16 When did that conversation</p> <p>17 occur? Was it after December 15, 16,</p> <p>18 17, 18th, those events?</p> <p>19 A. Do you mean my conversation with</p> <p>20 her or her conversation with him?</p> <p>21 Q. Your conversation with her.</p> <p>22 When did that happen?</p> <p>23 A. This was when she told me about</p> <p>24 his sex room.</p>	<p style="text-align: right;">20</p> <p>1 A. I guess I don't know for sure</p> <p>2 that he hasn't found her again since</p> <p>3 that Saturday morning.</p> <p>4 Q. Let's talk about that Saturday</p> <p>5 morning.</p> <p>6 Are you aware that</p> <p>7 Ms. Goodman went to his house?</p> <p>8 A. I'm aware, yes.</p> <p>9 Q. When did you become aware of</p> <p>10 what happened on Saturday, December</p> <p>11 17th?</p> <p>12 A. The next day.</p> <p>13 Q. I'm sorry. You said that you</p> <p>14 read it in her petition.</p> <p>15 Did you read her petition</p> <p>16 the next day, that Sunday?</p> <p>17 A. I knew about the details of what</p> <p>18 happened when I read the petition. I</p> <p>19 knew she had gone to his house, but I</p> <p>20 didn't know what had happened or I</p> <p>21 didn't know that he had raped her.</p> <p>22 Q. I want to pop back to that</p> <p>23 Friday night again.</p> <p>24 So sitting at dinner you</p>

<p style="text-align: right;">21</p> <p>1 understood the nature of the 2 relationship between Mr. Leon and 3 Ms. Goodman to be that he was sexually 4 harassing her and terrifying her. 5 Is that accurate to say? 6 A. Yes, and threatening her. 7 Q. Who else at the table knew 8 that? 9 A. I don't know what other people 10 knew. 11 Q. Did you discuss that with 12 anybody else who was the table that 13 night prior to that night? 14 A. No, I didn't. 15 Q. Had you discussed that with 16 anyone else other than the petitioner? 17 A. Certain aspects of what he had 18 done I had discussed with other people. 19 Q. And who? 20 A. Gabbie and Sabrina. 21 Q. Do they work at Young Conaway 22 too? 23 A. No, they don't. 24 I'm trying to think of who</p>	<p style="text-align: right;">23</p> <p>1 things throughout the night because I 2 saw him staring creepily at her, trying 3 to dance with her. 4 I saw her trying to move 5 away from him throughout the night. At 6 one point I physically asserted myself 7 between the two of them because I saw 8 that she looked really uncomfortable. 9 And I also believed, I 10 believed that she was assaulted or 11 about to be assaulted because she 12 texted and called me and asked for help 13 and said that he was chasing her and he 14 was following her. 15 Based on everything I knew 16 about what had been going on, the 17 threats that he had been making, I 18 believed that she had either already 19 been assaulted or was about to be 20 sexually assaulted. 21 Q. When she texted you that night 22 she said she was good, right? Friday 23 night she said I'm good, getting a 24 Uber?</p>
<p style="text-align: right;">22</p> <p>1 else, but I'm not sure who else. 2 Q. Had you discussed that with 3 Jesse Flowers? 4 A. Certain aspects with Jesse too, 5 yes. 6 Q. Did your understanding of their 7 relationship change that evening? 8 A. The way you're saying 9 relationship is confusing me, I guess. 10 That night my perception of the two of 11 them was that he was trying to sexually 12 assault her or had already sexually 13 assaulted her before I got there. 14 The next day my 15 understanding of their relationship 16 changed when she told me. 17 Q. Why was that your belief? 18 A. Based on everything she had told 19 me prior to that night I was worried 20 about him. 21 Q. You were worried that he had 22 sexually assaulted her that night? 23 A. I was worried about his behavior 24 towards her and I was keeping an eye on</p>	<p style="text-align: right;">24</p> <p>1 A. I think I recall a text that she 2 said I'm good, getting an Uber. 3 Q. Would it change your 4 understanding of what happened that 5 night if you knew more about their 6 relationship prior to that evening? 7 A. I probably would have been even 8 more terrified for her if I had known 9 he had been raping her for months. 10 Q. If you knew that earlier evening 11 she asked him to have sex would that 12 change your impression of what was 13 happening that evening? 14 A. No. I still would have been 15 even more terrified. 16 Q. If she was asking for sex? 17 A. Yes. Because I understand why 18 she was sending those Snapchat 19 messages. 20 Q. Why was that? 21 A. Based on what she told me it's 22 because he has made it very clear that 23 the only way to calm him down when he's 24 angry is through sex.</p>

<p style="text-align: right;">25</p> <p>1 Q. Was he angry that night?</p> <p>2 A. I don't know what anger he was</p> <p>3 displaying towards her that night, but</p> <p>4 I saw him staring a lot at her very</p> <p>5 creepily.</p> <p>6 Q. Were they sneaking off to make</p> <p>7 out during the course of the evening?</p> <p>8 A. I didn't see her sneaking off to</p> <p>9 make out with him.</p> <p>10 Q. What did you see? Did you see</p> <p>11 them kiss?</p> <p>12 A. No.</p> <p>13 Q. Is it your belief that he</p> <p>14 sexually assaulted her that night?</p> <p>15 A. It was my belief at the time</p> <p>16 that he was either going to or already</p> <p>17 had.</p> <p>18 Q. And how so?</p> <p>19 A. I don't understand your</p> <p>20 question. Can you clarify?</p> <p>21 Q. How did he sexually assault her?</p> <p>22 You said that you believed</p> <p>23 he either was going to or he already</p> <p>24 had. What was your belief that he had</p>	<p style="text-align: right;">27</p> <p>1 with her and the fact that she was</p> <p>2 uncontrollably sobbing with makeup</p> <p>3 streaks all over her face when I saw</p> <p>4 them led me to believe that he had</p> <p>5 already assaulted her or was about to</p> <p>6 assault her.</p> <p>7 She had mentioned in the</p> <p>8 phone call that he was trying to put</p> <p>9 her in his car against her will.</p> <p>10 Q. Where was his car when you</p> <p>11 arrived?</p> <p>12 A. I don't know.</p> <p>13 Q. So let's go back into Woody's.</p> <p>14 Before everybody left, were</p> <p>15 you drinking?</p> <p>16 A. Yes.</p> <p>17 Q. And over the course of that</p> <p>18 night how much do you think you drank?</p> <p>19 A. I had approximately 1-1/2</p> <p>20 espresso martinis at the restaurant,</p> <p>21 part of a beer at the bar after and a</p> <p>22 couple of beers at Woody's.</p> <p>23 Q. Were you taking anything else</p> <p>24 that night?</p>
<p style="text-align: right;">26</p> <p>1 already sexually assaulted her that</p> <p>2 evening?</p> <p>3 A. I think what you're asking is</p> <p>4 how he had assaulted her. And I don't</p> <p>5 know that I had a belief about the</p> <p>6 methods in which he was doing that, if</p> <p>7 that's what you're asking.</p> <p>8 Q. So generally, esoterically you</p> <p>9 believe that perhaps he did something</p> <p>10 that he shouldn't have done?</p> <p>11 MR. HACKER: Objection to</p> <p>12 form.</p> <p>13 You can answer if you can.</p> <p>14 A. Yeah. She was terrified and</p> <p>15 crying and asking me for help.</p> <p>16 Q. Why did your mind jump right to</p> <p>17 sexual assault?</p> <p>18 MR. HACKER: Objection to</p> <p>19 form.</p> <p>20 You can answer.</p> <p>21 A. Based on what she had told me</p> <p>22 in the past, his behavior at the club,</p> <p>23 the fact that I had a feeling for a</p> <p>24 while that he was creepily obsessed</p>	<p style="text-align: right;">28</p> <p>1 A. Are you asking like drugs or</p> <p>2 something?</p> <p>3 Q. Yes.</p> <p>4 A. No, I was not.</p> <p>5 Q. What interactions between</p> <p>6 Mr. Leon and Ms. Goodman did you</p> <p>7 observe once the group got to Woody's?</p> <p>8 A. Like I said before, he was</p> <p>9 trying to dance with her. He was</p> <p>10 staring a lot at her. I noticed that</p> <p>11 sometimes when she left the group he</p> <p>12 would disappear soon after. Sometimes</p> <p>13 I went looking for her because I was</p> <p>14 worried that he had followed her.</p> <p>15 Q. You never came upon the two of</p> <p>16 them together outside of the group, did</p> <p>17 you?</p> <p>18 A. Are you asking if I ever found</p> <p>19 them alone outside of the group?</p> <p>20 Q. Yes. You said when she left the</p> <p>21 group that he would also disappear.</p> <p>22 Did you ever find the two of</p> <p>23 them together?</p> <p>24 A. I don't recall.</p>

<p style="text-align: right;">29</p> <p>1 Q. Where were you when Ms. Goodman 2 left Woody's? 3 A. I don't know exactly when she 4 left. 5 Q. When did you leave? 6 A. Just approximately 1:30-ish. 7 Maybe a little bit prior to that. 8 Q. Why did you leave? 9 A. I walked out, we all walked out 10 because the night was over and we had 11 lost track of Chey and I wanted to find 12 her. 13 Q. At what point did you lose track 14 of her? 15 A. I can't say for sure. I don't 16 know if it was a few minutes or several 17 minutes or more than that. I don't 18 know. I can't recall exactly. 19 Q. Who was with you when you left? 20 A. When I physically walked out I 21 don't recall. 22 Q. What did you do when you left? 23 A. We stood outside the bar and I 24 texted Chey to see where she was.</p>	<p style="text-align: right;">31</p> <p>1 So you walked out. You were 2 standing outside of the club texting to 3 see where Ms. Goodman was. You said 4 she told you that she got in an Uber 5 and then you can't remember who called 6 who. You think you called each other. 7 Is that right? 8 A. I remember she called me. 9 Q. And what did she say when she 10 called you? 11 A. The gist of it was he's chasing 12 me; he wants me to go home with him; 13 help me. 14 Q. She asked you to help her? 15 A. Yeah. 16 Q. Do you know where Emily and 17 Hayden were at that point? 18 A. At the point that she called me 19 I don't remember where they were. 20 Q. And you don't remember who you 21 were with? 22 A. At the exact point when she was 23 calling me I don't remember which 24 people were right next to me, no. It</p>
<p style="text-align: right;">30</p> <p>1 Q. What did she tell you? 2 A. She said she was taking a Uber. 3 Q. Did you call her? 4 A. I think I called her. 5 Q. Did you review your call logs to 6 see if you called her? 7 A. My calls disappear after a 8 certain number of months. 9 Q. Did you take any steps to 10 prevent those calls from disappearing 11 after you received a hold letter from 12 me, a hold e-mail from me? 13 A. I'm sorry. I don't remember 14 receiving a hold e-mail from you. 15 Q. After you left you stood 16 outside. You were texting to see where 17 Ms. Goodman went to. 18 Then what happened? So she 19 told you she got in an Uber and then 20 what? 21 A. I'm sorry. Can you start the 22 question over again? 23 Q. Yes. I'm trying to figure out 24 what happened.</p>	<p style="text-align: right;">32</p> <p>1 was kind of a big group that night. 2 Q. Then what did you do? 3 A. After she called me? 4 Q. Yes. 5 A. I turned to Emily and Hayden and 6 I said I need to go to City Hall. 7 Where is City Hall? 8 They said we'll come with 9 you. And we started going towards City 10 Hall. 11 Q. Let me back up for a minute. 12 Was Ms. Goodman intoxicated 13 the last you saw her? 14 MR. HACKER: Objection to 15 form. 16 A. I don't know if she was 17 intoxicated, no. I don't know. 18 Q. How would you describe here? 19 Would you have trusted her to drive you 20 home? 21 A. No. I wouldn't have trusted 22 Edwin either. 23 Q. That night? 24 A. Right.</p>

<p>33</p> <p>1 Q. So when you last saw her she was 2 intoxicated to the point where you 3 wouldn't have trusted her to drive? 4 A. I don't want anyone to be like 5 driving after even one drink. 6 Q. Was she walking straight? Was 7 she slurring her words? 8 A. I don't recall, I don't recall 9 her slurring her words or anything like 10 that, no. 11 Q. Stumbling? 12 A. I don't recall seeing her 13 stumbling at the club or anything like 14 that, no. 15 Q. All right. So you turned to 16 Emily and Hayden and asked to go to 17 City Hall. 18 How did you get to City 19 Hall? 20 A. You mean was I on foot or by 21 car? 22 Q. Yes. 23 A. I was on foot. 24 Q. How long did it take you to get</p>	<p>35</p> <p>1 I think I was running a little faster 2 than them. 3 Q. And did you approach them? 4 A. I did. 5 Q. And what did you do next? 6 A. I saw her crying and panicking. 7 And I stood in front of him and the 8 gist of it was I told him to stay away 9 from her, to leave her alone. 10 Q. Did you strike him? 11 A. I don't recall striking him. 12 Q. Did you text Tim Powell the next 13 day and tell him that you struck him, 14 meaning Mr. Leon? 15 A. Can you show me the text 16 message? 17 Q. I'm asking you do you remember 18 that? 19 A. I think I remember texting him 20 that I had tried to. 21 Q. And do you remember leaving a 22 mark on Mr. Leon's face? 23 A. I don't recall leaving a mark, 24 no.</p>
<p>34</p> <p>1 there? 2 A. I don't know how many minutes. 3 I'm sorry. I think it was a pretty 4 quick -- I think it was pretty close 5 by, but I can't remember how many 6 minutes. 7 Q. Do you know how many city blocks 8 it was? 9 A. I don't recall. 10 Q. Did you run? Did you walk? 11 A. I started speed walking and then 12 when I saw across the street, I saw 13 them across the street that's when I 14 started running. 15 Q. What did you see? 16 A. I saw her cowering, like her 17 hands by her head (indicating) and 18 trying to turn away from him. And I 19 saw him with his arms out really wide 20 trying to encroach upon her and 21 stepping towards her while she tried to 22 move away from him. 23 Q. And who else was there? 24 A. Emily and Hayden were behind me.</p>	<p>36</p> <p>1 Q. Do you recall trying to kick 2 him? 3 A. I don't recall, no. 4 Q. Do you recall telling him you 5 were going to kill him? 6 A. Yes. 7 Q. Do you recall telling him that 8 Jesse was going to kill him? 9 A. Yes. 10 Q. How did that interaction end? 11 A. It ended with him starting to 12 walk away and him saying something 13 along the lines of I'm going to call 14 the cops on you. 15 Q. Did he get violent with you? 16 A. I don't recall. 17 Q. Did he hit you back? 18 A. I don't recall. 19 Q. Did he attack you? 20 A. I don't think so. 21 Q. Did he chase you? 22 A. I don't recall that either. 23 Q. Did he yell at you? 24 A. He yelled at me that he was</p>

<p>37</p> <p>1 going to call the cops on me.</p> <p>2 Q. Were police involved that night?</p> <p>3 A. I tried to involve them.</p> <p>4 Q. And what happened?</p> <p>5 A. Because as I was running towards</p> <p>6 Chey I saw a police car and I said</p> <p>7 please help, my friend is getting</p> <p>8 sexually assaulted.</p> <p>9 Q. Did the police car pull over?</p> <p>10 A. They were already pulled over.</p> <p>11 Q. And did the police officers</p> <p>12 intervene?</p> <p>13 A. No, they didn't.</p> <p>14 Q. Did you see a sexual assault?</p> <p>15 A. No.</p> <p>16 Q. Did Ms. Goodman tell you that</p> <p>17 she was being sexually assaulted?</p> <p>18 A. No.</p> <p>19 Q. Why would you say that to the</p> <p>20 police officers?</p> <p>21 A. Because it was my belief.</p> <p>22 Q. Even though you didn't see it</p> <p>23 and even though Ms. Goodman didn't say</p> <p>24 it?</p>	<p>39</p> <p>1 Q. What did you tell Mr. Leon would</p> <p>2 happen if he went to the police?</p> <p>3 A. When he said I'm going to call</p> <p>4 the cops on you?</p> <p>5 Q. Yes.</p> <p>6 A. I said I've already told the</p> <p>7 cops on you.</p> <p>8 Q. And was that in reference to you</p> <p>9 telling the police officers that he had</p> <p>10 sexually assaulted Ms. Goodman?</p> <p>11 MR. HACKER: Objection to</p> <p>12 form.</p> <p>13 You can answer.</p> <p>14 A. Yeah, that is when I flagged</p> <p>15 down the police officers and asked them</p> <p>16 for help.</p> <p>17 Q. I'm sorry if I asked this. I</p> <p>18 didn't check it off my list.</p> <p>19 Do you know where Mr. Leon</p> <p>20 parked his car on December 16th --</p> <p>21 A. I don't.</p> <p>22 Q. -- at the beginning of the</p> <p>23 night?</p> <p>24 A. I don't.</p>
<p>38</p> <p>1 A. That's correct.</p> <p>2 Q. Did you tell other people that</p> <p>3 night that Mr. Leon was sexually</p> <p>4 assaulting Ms. Goodman?</p> <p>5 A. I don't recall if I said that to</p> <p>6 anyone.</p> <p>7 Q. How come you can't recall</p> <p>8 striking and hitting my client but you</p> <p>9 can recall talking to the police</p> <p>10 officers?</p> <p>11 A. I can't explain it. I'm sorry.</p> <p>12 Q. Were there any other men of</p> <p>13 color present that evening during this</p> <p>14 event?</p> <p>15 A. During which event in</p> <p>16 particular?</p> <p>17 Q. When you happened upon Ms.</p> <p>18 Goodman at City Hall.</p> <p>19 A. The police officer that I</p> <p>20 flagged down was African-American.</p> <p>21 Q. Was anybody else in your group a</p> <p>22 man of color?</p> <p>23 A. In that group that night? I</p> <p>24 don't think so.</p>	<p>40</p> <p>1 Q. So you reported to the police</p> <p>2 that evening, you told the police</p> <p>3 officer that my client had sexually</p> <p>4 assaulted Ms. Goodman.</p> <p>5 What was the nature of the</p> <p>6 sexual assault that you believed</p> <p>7 happened?</p> <p>8 MR. HACKER: Objection to</p> <p>9 form. I think she's also answered this</p> <p>10 question.</p> <p>11 MS. SWASEY: I don't know</p> <p>12 that I agree with that.</p> <p>13 BY MS. SWASEY:</p> <p>14 Q. But what was the nature of the</p> <p>15 sexual assault that you believe</p> <p>16 happened?</p> <p>17 A. I think I told you before that I</p> <p>18 don't remember, I don't have a picture</p> <p>19 imagined of how he was assaulting her.</p> <p>20 Q. Do you have a picture of that</p> <p>21 now today? Do you believe that he</p> <p>22 sexually assaulted her on that Friday</p> <p>23 night?</p> <p>24 A. She hasn't told me that he</p>

<p>41</p> <p>1 assaulted her that Friday night.</p> <p>2 Q. And you didn't see that,</p> <p>3 correct?</p> <p>4 A. No, I didn't see him sexually</p> <p>5 assault her on Friday night.</p> <p>6 Q. Did you see him assault her in</p> <p>7 any way?</p> <p>8 A. I witnessed him trying to grab</p> <p>9 onto her when she was trying to get</p> <p>10 away from him.</p> <p>11 Q. I want to move to the next</p> <p>12 morning, Saturday, December 17th.</p> <p>13 When was the first time the</p> <p>14 next day that you communicated with</p> <p>15 Ms. Goodman?</p> <p>16 A. I don't remember the exact time.</p> <p>17 It was in the morning.</p> <p>18 Q. What time did you drop her off</p> <p>19 the evening before to her home when you</p> <p>20 were with Emily and Hayden driving</p> <p>21 home?</p> <p>22 A. It was in the very early morning</p> <p>23 but I don't know the exact time.</p> <p>24 Q. 2:00 a.m.? 3:00 a.m.?</p>	<p>43</p> <p>1 Q. What did she tell you?</p> <p>2 A. The gist of it was that she had</p> <p>3 been trying to get away from him and</p> <p>4 that she was very grateful that I found</p> <p>5 her.</p> <p>6 Q. Did you talk about the fact that</p> <p>7 he reported your actions that night to</p> <p>8 the police?</p> <p>9 A. She told me that he had made a</p> <p>10 threat that he would file a police</p> <p>11 report against me, yes.</p> <p>12 Q. At that point did you talk to</p> <p>13 anybody else about what happened the</p> <p>14 night before?</p> <p>15 A. Are you asking me if I talked to</p> <p>16 other people that weren't there that</p> <p>17 night?</p> <p>18 Q. Whether they were there or not</p> <p>19 there, anybody else?</p> <p>20 A. Yes.</p> <p>21 Q. Who did you talk to?</p> <p>22 A. I talked to Jesse, I talked to</p> <p>23 Tim, Roxanne and Alex and Nikita, Emily</p> <p>24 and Hayden.</p>
<p>42</p> <p>1 A. Around that time frame, yes.</p> <p>2 Q. Were you in the car with her at</p> <p>3 all when she was calling Mr. Leon?</p> <p>4 A. No.</p> <p>5 Q. I'm sorry. The next morning</p> <p>6 when was the first time you</p> <p>7 communicated with her?</p> <p>8 A. Like I said before, I don't know</p> <p>9 the exact time stamp, but I know it was</p> <p>10 in the morning.</p> <p>11 Q. And in what way did you</p> <p>12 communicate with her? Text message?</p> <p>13 Phone?</p> <p>14 A. Oh, I don't recall which it was.</p> <p>15 Q. Did you talk to her in the</p> <p>16 morning?</p> <p>17 A. Yes.</p> <p>18 Q. On the phone?</p> <p>19 A. I don't know if I talked to her</p> <p>20 on the phone. I don't remember.</p> <p>21 Q. What were you communicating</p> <p>22 about that morning?</p> <p>23 A. We talked about how scary the</p> <p>24 night before was.</p>	<p>44</p> <p>1 Q. Did everybody else share your</p> <p>2 belief that Edwin had sexually</p> <p>3 assaulted Ms. Goodman?</p> <p>4 MR. HACKER: Objection to</p> <p>5 form.</p> <p>6 You can answer.</p> <p>7 A. I don't know what other people's</p> <p>8 beliefs were.</p> <p>9 Q. Did they tell you?</p> <p>10 A. I don't recall who said what.</p> <p>11 Q. Did anyone else tell you that</p> <p>12 they had the belief that Mr. Leon had</p> <p>13 sexually assaulted Ms. Goodman that</p> <p>14 night?</p> <p>15 A. I think a couple of people said</p> <p>16 something along the gist of he might</p> <p>17 have, he might have tried to sexually</p> <p>18 assault her if we hadn't stepped in,</p> <p>19 but I really can't remember the</p> <p>20 specifics of what people said or who</p> <p>21 said what.</p> <p>22 Q. Did you talk to anybody outside</p> <p>23 of that group that day or thereafter</p> <p>24 about what happened on Friday night?</p>

<p style="text-align: right;">45</p> <p>1 A. Yes. 2 Q. Who? 3 A. Like I said before, I spoke with 4 Jesse. 5 Q. I'm sorry. In addition to that 6 group, anybody else? 7 A. I'm sorry. Yes. I said a 8 little bit to Gabbie and Sabrina and to 9 some members of my family. 10 And that's it, I think. 11 Q. When you spoke to Ms. Goodman 12 where did you think she was on that 13 Saturday? 14 A. Well, when I was speaking with 15 Chey I was sitting right next to her. 16 Q. Oh, you spoke in person? 17 A. Yes. 18 Q. So when is it that you were 19 communicating with her either by phone 20 or text message? 21 A. You asked me if I had spoken 22 with her on text or on call and I said 23 I didn't remember. 24 Q. So you were speaking to her in</p>	<p style="text-align: right;">47</p> <p>1 family. 2 I can't remember who 3 exactly. 4 Q. What's your aunt's name and 5 what's your sister's name? 6 A. Jan Jurden is my aunt and I have 7 three sisters. One of them is Naomi. 8 Q. Is that the one you spoke to? 9 A. Like I said before, I don't know 10 which one I might have spoken to, if I 11 spoke to any of them at all. I can't 12 quite remember every phone call. I can 13 give you their names if you want. 14 Q. Did you talk to all three of 15 your sisters about what happened? 16 A. Yes, at different points in 17 time. 18 Q. Were you concerned that you were 19 going to face criminal charges from 20 what happened the night before, Friday 21 night? 22 A. No. 23 Q. Why not? 24 MR. HACKER: Objection to</p>
<p style="text-align: right;">46</p> <p>1 real life? Were you guys in person? 2 A. Yes. 3 Q. So when you say you don't 4 remember if you were talking to her by 5 text or phone call, was there a 6 subsequent conversation after the two 7 of you spoke in person? 8 A. I think, yeah, I called her 9 later that day, texted her later that 10 day. 11 Q. Did you record those phone 12 calls? 13 A. No. 14 Q. When you said you talked to your 15 family members, what family members did 16 you talk to? 17 A. Is this the day after or any day 18 after? 19 Q. December 17th and thereafter. I 20 think that was the question. 21 A. I know I spoke with my aunt. I 22 might have spoken with one of my 23 sisters and maybe my parents. I don't 24 remember. Maybe someone else in my</p>	<p style="text-align: right;">48</p> <p>1 form. 2 You can answer if you're 3 able. 4 A. Because I did nothing wrong. 5 Q. You did nothing wrong or you 6 couldn't recall that you did anything 7 wrong? 8 MR. HACKER: Objection to 9 form and substance. 10 You can answer if you're 11 able. 12 A. I did nothing wrong. 13 Q. What did you tell all these 14 people, Jesse, Tim, Roxanne, Alex, 15 Nikita, Hayden, Gabbie, Sabrina, your 16 aunt, your three sisters, your mother? 17 What did you tell them? 18 A. It's going to take a little 19 time. I'm going to -- 20 Q. Did you tell them all the same 21 story? 22 A. I told certain people parts of 23 the story. I didn't tell other people 24 the whole story, if that makes sense.</p>

<p style="text-align: right;">49</p> <p>1 When I was speaking with the 2 people that were in the group that 3 night, you asked if I had spoken to 4 them about it and when I answered I 5 spoke with Tim and Roxanne and Emily 6 and Hayden because they were, you know, 7 with us that night taking us home and 8 they saw Chey crying. 9 Q. Did you talk to Alex Farris? 10 I'm sorry. Was he -- 11 A. Yes. I think he was there when 12 we were. 13 Q. Did you call him specifically? 14 Did you call each individual person the 15 next day? 16 A. Yes. 17 Q. Why were you calling each 18 individual person the next day? 19 A. I wanted to check in on them, 20 let them know that I was doing okay, 21 Chey is doing okay, see how they were 22 doing. It was a traumatic event. 23 Q. Did you call Edwin? 24 A. No.</p>	<p style="text-align: right;">51</p> <p>1 Q. To him or others. 2 A. Okay. I can't recall if I ever 3 used those exact words. 4 Q. Did you tell people to say if 5 they heard from Mr. Leon that they 6 should say that they were afraid? 7 A. That they should say they were 8 afraid? 9 Q. Yes. 10 A. I don't recall. 11 Q. Did you communicate with your 12 colleagues who received subpoenas about 13 those subpoenas? 14 A. Are you asking me if I 15 communicated about the substance of 16 them or about the fact that they had 17 been served in the first instance? 18 Q. Either. 19 A. Yes. 20 Q. What was the nature of your 21 discussions about the subpoenas? 22 MR. HACKER: Objection. 23 Don't answer anything about 24 our communications, but you can</p>
<p style="text-align: right;">50</p> <p>1 Q. Did you report what happened to 2 the firm? 3 A. I didn't report it. 4 Q. Who did? 5 A. Chey did. 6 Q. When? 7 A. I think it was December 18th on 8 a Sunday. 9 Q. Were you going to report it if 10 she didn't? 11 MR. HACKER: Objection to 12 form. 13 You can answer. 14 A. I wasn't going to report 15 anything she wasn't comfortable with me 16 reporting. 17 Q. Did you ever call Mr. Leon a 18 rapist? 19 A. I don't recall if I told him he 20 was a rapist. 21 Q. Did you say that he was a 22 dangerous predator? 23 A. Are you asking me if I said this 24 to him or to others, just to clarify?</p>	<p style="text-align: right;">52</p> <p>1 communicate about other people. 2 Q. Yes. I'm sorry. The question 3 was: Did you communicate with your 4 colleagues who received subpoenas? 5 For the record, I did not 6 subpoena Mr. Hacker, although at times 7 I feel like the rest of the Delaware 8 Bar. 9 Did you communicate with 10 your colleagues who received subpoenas 11 and what was the nature of that 12 discussion? 13 A. The nature of that discussion 14 was how ridiculous it was. 15 Q. And why is it ridiculous? 16 A. Because we're non-parties. 17 Q. And did you discuss with anyone 18 service? 19 A. I don't understand your 20 question. 21 Q. Were you discussing how to 22 avoid service of process with any of 23 your colleagues that were receiving 24 subpoenas?</p>

<p>53</p> <p>1 A. No.</p> <p>2 Q. Sorry. I didn't hear that.</p> <p>3 A. No.</p> <p>4 Q. No?</p> <p>5 A. I wasn't advising them on how to</p> <p>6 avoid service of process.</p> <p>7 Q. Did you discuss avoiding service</p> <p>8 of process with any of your colleagues</p> <p>9 that received subpoenas?</p> <p>10 MR. HACKER: Objection to</p> <p>11 form.</p> <p>12 You can answer.</p> <p>13 A. I know that people were trying,</p> <p>14 I know that people were trying to serve</p> <p>15 me and when they tried to serve me I</p> <p>16 accepted service immediately.</p> <p>17 Q. Are you aware of whether other</p> <p>18 people were avoiding service of</p> <p>19 process?</p> <p>20 A. I don't know what other people</p> <p>21 were doing.</p> <p>22 Q. What did Ms. Goodman share with</p> <p>23 you about the alleged assault on the</p> <p>24 early morning of December 17th?</p>	<p>55</p> <p>1 for?</p> <p>2 A. I don't know what he was</p> <p>3 punishing her for.</p> <p>4 Q. Was that the only thing that she</p> <p>5 told you about that event?</p> <p>6 A. I don't recall if there were</p> <p>7 other things that she said to me about</p> <p>8 that night.</p> <p>9 Q. And when is it that she told you</p> <p>10 that?</p> <p>11 A. I don't remember exactly when.</p> <p>12 Q. When did she show you the</p> <p>13 petition?</p> <p>14 A. She showed it to me the day that</p> <p>15 she filed it.</p> <p>16 Q. And when did the conversation</p> <p>17 between the two of you about the events</p> <p>18 of Saturday occur?</p> <p>19 A. Like I said before, I don't</p> <p>20 remember.</p> <p>21 I'm sorry. If you're asking</p> <p>22 about the rape, like I said, I don't</p> <p>23 remember when that conversation</p> <p>24 occurred, to clarify.</p>
<p>54</p> <p>1 A. She told me -- she didn't tell</p> <p>2 me about that. I read it in the</p> <p>3 petition.</p> <p>4 Q. So she never told you what</p> <p>5 happened on December 17th?</p> <p>6 A. She never told me that he raped</p> <p>7 her that day until I read it in the</p> <p>8 petition.</p> <p>9 Q. Have you ever discussed it with</p> <p>10 her?</p> <p>11 A. Yes.</p> <p>12 Q. And what did she tell you?</p> <p>13 A. She told me that she, she told</p> <p>14 me that she didn't like doing that</p> <p>15 stuff and that he knew that she didn't</p> <p>16 like that and she felt like he was</p> <p>17 punishing her extra hard.</p> <p>18 Q. What does "doing that stuff"</p> <p>19 mean?</p> <p>20 A. Oral sex.</p> <p>21 Q. And he was punishing her?</p> <p>22 A. That was the gist of what she</p> <p>23 said to me, yes.</p> <p>24 Q. And what was he punishing her</p>	<p>56</p> <p>1 Q. Was it your belief that he had</p> <p>2 raped her or sexually assaulted her</p> <p>3 before that Friday?</p> <p>4 A. Can you ask me when my belief,</p> <p>5 like --</p> <p>6 Q. Yes. Sitting here today, do you</p> <p>7 believe that he raped her prior to that</p> <p>8 Friday in December?</p> <p>9 A. Sitting here today do I believe</p> <p>10 he raped her prior to Saturday?</p> <p>11 Q. Yes.</p> <p>12 A. Yes, I do believe that.</p> <p>13 Q. And why?</p> <p>14 A. She told me that she was</p> <p>15 terrified of him that night and that's</p> <p>16 why.</p> <p>17 Q. And what did she tell you?</p> <p>18 A. That's a very broad question.</p> <p>19 Q. What did she tell you that led</p> <p>20 you to believe that he raped her prior</p> <p>21 to that Friday and Saturday?</p> <p>22 A. As I described before, things</p> <p>23 that she had said to me. I really</p> <p>24 don't want to say them again.</p>

<p>57</p> <p>1 Q. She told you that he raped her</p> <p>2 prior to that date?</p> <p>3 MR. HACKER: Objection to</p> <p>4 form.</p> <p>5 A. I feel like I answered this</p> <p>6 already, but yes.</p> <p>7 Q. Did she use those words? Did</p> <p>8 she say that he raped her prior to that</p> <p>9 Friday and Saturday?</p> <p>10 A. Yes.</p> <p>11 Q. Not did she tell you prior to</p> <p>12 the Friday and Saturday but did she</p> <p>13 tell you that it happened prior to</p> <p>14 Friday and Saturday?</p> <p>15 A. Yes.</p> <p>16 Q. Did she say how many times he</p> <p>17 had raped her prior to the Friday-</p> <p>18 Saturday?</p> <p>19 A. I don't recall.</p> <p>20 Q. Did she say where?</p> <p>21 A. Yes.</p> <p>22 Q. Where?</p> <p>23 A. In his house.</p> <p>24 Q. Did she ever allege that he</p>	<p>59</p> <p>1 MR. HACKER: Objection to</p> <p>2 form.</p> <p>3 You can answer.</p> <p>4 A. She hadn't told me that she was</p> <p>5 getting raped.</p> <p>6 Q. I'm going to clarify. Not a sin</p> <p>7 of omission where she didn't tell you</p> <p>8 something. But has she ever told you</p> <p>9 something that was false?</p> <p>10 MR. HACKER: Objection to</p> <p>11 form.</p> <p>12 You can answer.</p> <p>13 A. Yes.</p> <p>14 Q. And what did she lie to you</p> <p>15 about?</p> <p>16 A. Can I just grab my ring that</p> <p>17 fell on the floor?</p> <p>18 Q. Yes.</p> <p>19 A. Thank you.</p> <p>20 Chey lied to me about the</p> <p>21 fact that she said she had an allergic</p> <p>22 reaction to something once.</p> <p>23 Q. Can you elaborate on that? What</p> <p>24 was the truth?</p>
<p>58</p> <p>1 raped her at her house or apartment?</p> <p>2 A. I don't recall her saying that.</p> <p>3 Q. Prior to December, that December</p> <p>4 weekend, were you and Mr. Leon friends?</p> <p>5 A. Yes, we were.</p> <p>6 Q. And did there come a time that</p> <p>7 you had a falling-out?</p> <p>8 A. Yes.</p> <p>9 Q. When was that?</p> <p>10 A. The rough time frame is</p> <p>11 September.</p> <p>12 Q. Why? What was the nature of the</p> <p>13 falling-out?</p> <p>14 A. Well, that's an interesting</p> <p>15 question. He believes that the reason</p> <p>16 we weren't friends anymore is because</p> <p>17 he made some nasty comments to me at a</p> <p>18 dinner.</p> <p>19 The real reason that I</p> <p>20 stopped being his friend is because</p> <p>21 Chey had told me at that point that he</p> <p>22 had been bullying her at work.</p> <p>23 Q. Has Ms. Goodman lied to you</p> <p>24 about anything that you're aware of?</p>	<p>60</p> <p>1 A. The truth I believe is that</p> <p>2 Edwin drugged her.</p> <p>3 Q. And when was that?</p> <p>4 A. Sometime around Thanksgiving, so</p> <p>5 November.</p> <p>6 Q. And why do you believe that</p> <p>7 Edwin drugged her?</p> <p>8 A. Based on what Chey told me.</p> <p>9 Q. And what did she tell you?</p> <p>10 A. I'm sorry. Can we bring some</p> <p>11 tissues down to my friend?</p> <p>12 Q. What did she tell you?</p> <p>13 A. She told me that she was at his</p> <p>14 house and wanted to leave. This is the</p> <p>15 gist of it. She was at his house and</p> <p>16 she wanted to leave. He made her a cup</p> <p>17 of coffee and brought it to her, said</p> <p>18 he wanted to go to the bookstore with</p> <p>19 her. She said no.</p> <p>20 She left and went to the</p> <p>21 bookstore, started feeling woozy and</p> <p>22 she didn't know what was happening.</p> <p>23 And then he called her and</p> <p>24 said hey, how are you doing, something</p>

<p style="text-align: right;">61</p> <p>1 like that? And then he picked her up, 2 took her back to his place and she woke 3 up in his bed with his clothes on. 4 Q. When did she tell you this? 5 A. I don't remember exactly when. 6 Q. Was it before or after these 7 December incidents? 8 A. After. 9 Q. And your conclusion from that 10 story is he drugged her? 11 A. That's the conclusion that she 12 made and I agreed with. 13 Q. I thought you said she said she 14 had an allergic reaction. 15 A. You asked if she ever lied to 16 me. She lied to me in November when 17 she said she thought she had an 18 allergic reaction. 19 Q. In November she told you she had 20 an allergic reaction. What was the 21 context of that conversation? 22 A. We were supposed to hang out 23 that night. 24 Q. And she blew you off?</p>	<p style="text-align: right;">63</p> <p>1 A. In a text, I think. 2 Q. Did you ever question whether 3 the alleged assault actually occurred? 4 A. When? Which alleged sexual 5 assault? 6 Q. Well, let's start with the 7 December 17th. 8 A. Like I said, it was my belief 9 that he had already assaulted her or 10 was about to assault her. 11 Q. I'm sorry. Did you ever think 12 that she might be lying? 13 A. No. I believed her. 14 Q. I'm just checking my notes to 15 see if I checked everything off. 16 I want to go back to the 17 conversation about did you communicate 18 with your colleagues who received 19 subpoenas about those subpoenas? We 20 talked about discussing service. 21 Did you ever discuss with 22 any of the other folks who received 23 subpoenas how you were going to respond 24 to the subpoenas?</p>
<p style="text-align: right;">62</p> <p>1 A. I guess you could call it that. 2 Q. Did she text you that day and 3 say I'm having an allergic reaction and 4 I can't come or did she just no show 5 you? 6 A. I don't remember the specifics 7 of what she said, but she said I think 8 I'm having an allergic reaction. 9 Maybe it really wasn't a 10 lie. It was her saying I think. I 11 don't know. 12 Q. Why was she at his house that 13 day? Do you know? 14 A. I don't know. 15 Q. Did Ms. Goodman ever suggest to 16 you that she wasn't sure about the 17 details regarding the alleged sexual 18 assault in December by Mr. Leon? 19 A. Yes. 20 Q. And what did she tell you? 21 A. I can't recall exactly what she 22 said. 23 Q. How did this conversation take 24 place?</p>	<p style="text-align: right;">64</p> <p>1 MR. HACKER: Objection to 2 form. 3 You can answer. 4 A. All these questions about 5 service, I don't recall all of this, 6 all of this stuff. I'm sorry. 7 Q. Not about service. Did you 8 discuss how you were all going to 9 respond to the subpoenas? 10 A. I don't recall. 11 Q. Those conversations would have 12 happened in the last two weeks, right? 13 A. Yeah. 14 Q. You don't recall those 15 conversations? 16 A. No. 17 Q. Did you have conversations? 18 A. We had conversations. 19 Q. What was the nature of the 20 conversations? 21 A. Like Chris got served today. I 22 think maybe Alex accepted service. 23 Gabbie called me to say she had gotten 24 served. Sabrina said the process</p>

<p>65</p> <p>1 server had called her and she had 2 picked up and invited her to come to 3 his house and he never showed up. 4 Q. I said discussions about 5 service. Did any of you discuss the 6 substance of the subpoenas? 7 A. Do you mean like what they were 8 asking for? 9 Q. Yes, what they were asking for, 10 how you were going to respond. 11 A. I don't recall having 12 conversations about how I was going to 13 respond. 14 Q. How other people would respond, 15 did you have those conversations? 16 A. I don't recall. I'm sorry. 17 Q. Were you and Mr. Leon close 18 friends before your falling out in 19 September? 20 A. Yes, we were. 21 Q. Did you take trips together? 22 A. Yes. 23 Q. Did you feel safe with him? 24 A. I guess. I mean...</p>	<p>67</p> <p>1 until the present? 2 A. I'm sorry. Can you clarify the 3 question? Am I aware right now? 4 Q. Either. 5 At any point did you become 6 aware whether Ms. Goodman was dating 7 anybody from July until present? 8 A. I'm not aware of any boyfriends, 9 no. 10 Q. Are you aware of what the status 11 of the criminal charges against my 12 client might be? 13 A. Actually, no, I don't. 14 MS. SWASEY: Thank you. I 15 think that's it. 16 MR. HACKER: No questions. 17 THE COURT REPORTER: Reading 18 and signing? 19 MR. HACKER: Yes, reading 20 and signing. 21 MS. SWASEY: Okay. 22 THE COURT REPORTER: I 23 understand there's a need for quick 24 turnaround on the transcripts. When do</p>
<p>66</p> <p>1 Q. Did he ever sexually assault 2 you? 3 A. No. 4 Q. Did he rape you? 5 A. No. 6 Q. Were you aware if he sexually 7 assaulted or raped anybody else? 8 A. I was not aware. 9 Q. Do you know if you're facing 10 criminal charges in Pennsylvania as a 11 result of the Friday evening, the wee 12 hours of Friday evening? 13 A. At this very moment right now I 14 do not know. 15 Q. If Ms. Goodman had been lying 16 about being assaulted and, in fact, 17 they were having a relationship, a 18 consensual sexual relationship -- 19 strike that. Strike that. I just want 20 to see if my client has any additional 21 questions. 22 Are you aware of whether 23 Ms. Goodman had a boyfriend or was 24 seeing anybody else let's say in July</p>	<p>68</p> <p>1 counsel need the transcripts? 2 MS. SWASEY: Tomorrow. 3 THE COURT REPORTER: Patty, 4 do you also need the transcripts for 5 tomorrow? 6 MS. WEIR: Yes. 7 (Deposition concluded at 8 4:55 p.m.) 9 - - - - - 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>

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